

eircomments - Rebuttal Comments - Glenn Bossow

From: Glenn Bossow <[REDACTED]>
To: <eircomments@mtc.ca.gov>
Date: 7/18/2013 4:00 PM
Subject: Rebuttal Comments - Glenn Bossow

Dear MTC,

The purpose of this letter is address the shortcomings in MTC response to my initial comments on the Draft Bay Area Plan Environmental Report.

Specifically;

1. The rebuttal references section D.2 citing studies “voluminous peer-reviewed, credible research to support “benefits” of transit oriented development.” For studies supporting GHG and TOD policies we can equally identify studies which support the opposite conclusion such as Cato Institute, Policy Analysis 615, April 14, 2008 which concludes on average auto use yields lower per capita, per mile GHG than mass transit. Equally the study might refer to the study of Orenco Station (Portland Oregon) (source: Assessing the Social and Environmental Achievements of New Urbanism: Evidence from Portland, Oregon” by Bruce Podobnik, Department of Sociology, Lewis and Clark College, Portland, Oregon- July 15, 2009, raft of paper submitted for presentation at the Annual Meeting of the American Sociological Association San Francisco, August 2009). This study which assesses the social and environmental achievements of TOD in reducing car usage by residents near the station, the study concluded: ‘However, the majority of residents in all four neighborhoods (including the new urbanist neighborhood) rely on single occupancy vehicles for their regular commute” and that the station had proved “not very effective in increasing primary reliance on mass transit for commuting.” The absence of counter studies which do not support ABAG and MTC goals are evidence this report chose data supporting this predetermined outcome rather than consider studies at odds with this predetermined outcome.
2. The response raised to my concerns regarding water sources are devoid of substance. The reason for this is clear, there is no realistic plan for dealing with water issues. The final EIR report states water issues “are not expected in the areas served by Marin Municipal Water District”. Yet Marin has suffered drought years with its current population. That water resources will not be severely strained with current water infrastructure is pure magical thinking on the part of those who created this plan. The plan fails to address that if the Bay Area has higher population levels why will it not have a water shortfalls brought on with this increase. The Plan even acknowledges shortfalls but refers to taking water from surrounding communities- without mentioning impact on those surrounding communities or the environment.
3. Wholly inadequate is the response to the delta between population projections of ABAG and DOF. The entire response to this question essentially is ABAG’s methodology is better, as of course evaluated by ABAG. The response mentions the DOF numbers fail to account for “irregularities” such as job losses that occurred in 2000-2002 and 2007-2010 in the decade of the 2000s, thus according to ABAG we are to believe all these years are simply “irregularities” despite the fact these years constituted over half the decade. Finally your response does nothing to address my question of why we are not using DOF given they are used for the California budgetary proces.
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